

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 10-197

v.

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SECTION: "C"

**THOMAS G WILLIAMS
a/k/a "Cuz" "Tom"**

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FACTUAL BASIS

The above-named defendant, **THOMAS G. WILLIAMS**, has agreed to plead guilty as charged to Count one and twelve of the Indictment now pending against him. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegation against the defendant, **THOMAS G. WILLIAMS**.

This case was indicted after a series of court approved wiretaps and centered around the distribution of kilos of heroin in the New Orleans metro area. **WILLIAMS** was one of ten defendants eventually charged with distribution and conspiracy to distribute heroin in violation of the Federal Controlled Substances Act.

Unless stated otherwise, all events set forth herein occurred in the Eastern District of Louisiana.

For purposes of the beginning of the conspiracy to traffic and distribute heroin in New Orleans and the Eastern District of Louisiana on March 7, 2008, **THOMAS G. WILLIAMS** was chased by NOPD in New Orleans East after coming from Houston, Texas to New Orleans to distribute heroin. NOPD officers observed **WILLIAMS** speed through a red light at the corner of Bundy and Lake Forrest Boulevard in New Orleans East. After following **WILLIAMS**, they observed him crash his vehicle (Texas plate DBJ-959) into another car at the corner of Crowder and Lake Forrest Boulevard. **WILLIAMS** then proceeded until he crashed the vehicle near America and Dwyer Roads. **WILLIAMS** then feld on foot. NOPD discovered 111.6 net grams of heroin in his vehicle along with his cell phone and a registration for the car in his name only. **WILLIAMS** admits the heroin discovered in his vehicle was his and he was distributing heroin in New Orleans from at least March 7, 2008 until July 1, 2010.

On Sunday May 16, 2010, at 11:00 AM officers from New Orleans Police Department conducted a traffic stop on Interstate 10 near the Orleans Avenue exit on co-defendant **LATOYA JORDAN**. **JORDAN** was carrying a package of heroin on May 16, 2010 and that package had a total net weight of 996.8 net grams.

WILLIAMS admits that he directed **LATOYA JORDAN** to bring two kilos to the Eastern District of Louisiana on his behalf on or about May 15-16, 2010. **WILLIAMS** also admits that **JORDAN** was a drug courier for him and routinely moved narcotics for him in addition to transporting cash between New Orleans and Houston, Texas where **WILLIAMS** lived.

On July 14, 2010, in Houston Texas, DEA agents arrested **WILLIAMS** after he fled from his residence while DEA was preparing to conduct a search warrant on his home. **WILLIAMS** admits he threw a brick of heroin from his vehicle while fleeing from the DEA and that the heroin package consisted of 956.1 net grams of heroin.

WILLIAMS admits that his distribution of heroin in the Eastern District of Louisiana was a violation of the Federal Controlled Substances Act and that his distribution of heroin in conjunction with his co-defendants and others known and unknown to the Grand Jury was a drug conspiracy in that he agreed to distribute narcotics in violation of Federal law.

All the narcotics recovered in this matter were tested at the South Central Laboratory in Dallas, Texas and tested positive for heroin.

Counsel for the government and the defense do not concur on the amount of narcotics distributed in the conspiracy. In addition, counsel do not agree as to any other relevant conduct, any enhancements and any aggravating factors that may be appropriate. As a result, counsel desire a sentencing hearing to resolve these issues after a Pre-sentence report is completed by U. S. Probation.

THOMAS G. WILLIAMS
Defendant

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